

No. _____

19-5745
IN THE

SUPREME COURT OF THE UNITED STATES

Mary Ryan, Petitioner,

vs.

Robert J. Connelly, III, et al.

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

The petitioner asks leave to file the attached petition for a writ of certiorari without prepayment of costs and to proceed *in forma pauperis*.

Please check the appropriate boxes:

FILED
AUG 26 2019
OFFICE OF THE CLERK
SUPREME COURT, U.S.

Petitioner has previously been granted leave to proceed *in forma pauperis* in the following courts: 10

Rhode Island Superior Court, but then it was overturned by another Rhode Island

Superior Court Justice of equal jurisdiction, and the issue was brought on appeal.

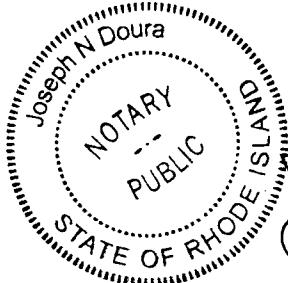
Petitioner has not previously been granted leave to proceed *in forma pauperis* in any other court.

Petitioner's affidavit or declaration in support of this motion is attached hereto.

Petitioner's affidavit is not attached because the court below appointed counsel in the current proceeding, and:

The appointment was made under the following provision of law: _____, or _____

a copy of the order of appointment is appended.




(Signature)

**AFFIDAVIT OR DECLARATION
IN SUPPORT OF MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS***

I, Mary Ryan, am the petitioner in the above-entitled case. In support of my motion to proceed *in forma pauperis*, I state that because of my poverty I am unable to pay the costs of this case or to give security therefor; and I believe I am entitled to redress.

1. For both you and your spouse estimate the average amount of money received from each of the following sources during the past 12 months. Adjust any amount that was received weekly, biweekly, semiannually, or annually to show the monthly rate. Use gross amounts, that is, amounts before any deductions for taxes or otherwise.

Income source	Average monthly amount during the past 12 months		Amount expected next month	
	You	Spouse	You	Spouse
Employment	\$ <u>Ø</u>	\$ <u>6,460.00</u>	\$ <u>Ø</u>	\$ <u>6,460.00</u>
Self-employment	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>
Income from real property (such as rental income)	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>
Interest and dividends	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>
Gifts	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>
Alimony	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>
Child Support	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>
Retirement (such as social security, pensions, annuities, insurance)	\$ <u>Ø</u>	\$ <u>2,317.00</u>	\$ <u>Ø</u>	\$ <u>2,317.00</u>
Disability (such as social security, insurance payments)	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>
Unemployment payments	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>
Public-assistance (such as welfare)	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>
Other (specify): _____	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>
Total monthly income:	\$ <u>Ø</u>	\$ <u>8,777.00</u>	\$ <u>Ø</u>	\$ <u>8,777.00</u>

2. List your employment history for the past two years, most recent first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
<u>RI Hope/volunteer</u> <u>civics educator</u>	<u>544 Victory Hwy</u> <u>Mapleville, RI</u>	<u>2011 – present</u>	\$ <u>Ø</u>
			\$
			\$

3. List your spouse's employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
<u>Electronic Alarms</u>	<u>Arlington, MA</u>	<u>2001-present</u>	\$ <u>6,460.00 approx</u>
			\$
			\$

4. How much cash do you and your spouse have? \$ 600.00 that does not belong to us, but to my Aunt's Estate.

Below, state any money you or your spouse have in bank accounts or in any other financial institution.

Financial Institution	Type of account	Amount you have	Amount your spouse has
<u>GCU</u>	<u>Savings/checking</u>	<u>\$ 1,500 approx.</u>	<u>\$ same account</u>
<u>Navigant</u>	<u>Savings</u>	<u>\$ 1,300 approx</u>	<u>\$ same account</u>
		\$	\$

5. List the assets, and their values, which you or your spouse owns. Do not list clothing and ordinary household furnishings.

Home

Value Approx. 250K

Other real estate

Value N/A

Motor Vehicle #1

Year, make & model 2014 Ford passenger van

Value 10k

Motor Vehicle #2

Year, make & model 2009 trailer

Value 12k

Other assets

Description Wedding rings, kayak,,

Value \$1500, \$450

6. State every person, business, organization owing you or your spouse money, and the amount owed.

Person owing you or your spouse money	Amount owed to you	Amount owed to your spouse
N/A	\$ N/A	\$ N/A
	\$ _____	\$ _____
	\$ _____	\$ _____

7. State the persons who rely on you or your spouse for support.

Name	Relationship	Age
_____	_____	_____
_____	_____	_____
_____	_____	_____

8. Estimate the average monthly expenses of you and your family. Show separately the amounts paid by your spouse. Adjust any payments that are made weekly, biweekly, quarterly, or annually to show the monthly rate.

	You	Your spouse
Rent or home mortgage payment (include lot rented for mobile home)	\$ 999.87	\$ 999.87
Are real estate taxes included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is property insurance included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ 750.00	\$ 750.00
Home maintenance (repairs and upkeep)	\$ 300.00	\$ 300.00
Food	\$ 1,000.00	\$ 1,000.00
Clothing	\$ 50.00	\$ 50.00
Laundry and dry-cleaning	\$ 90.00	\$ 90.00
Medical and dental expenses	\$ Ø	\$ Ø

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ 100.00	\$ 100.00
Recreation, entertainment, newspapers, magazines, etc.	\$ 400.00	\$ 400.00
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ 187.00	\$ 187.00
Life	\$ 120.00	\$ 120.00
Health	\$ 580.00	\$ 580.00
Motor Vehicle	\$ 218.00	\$ 218.00
Other: _____	\$ Ø	\$ Ø
Taxes (not deducted from wages or included in mortgage payments)		
(specify): <u>Car, Fire & House</u>	\$ 487.50	\$ 487.50
Installment payments		
Motor Vehicle	\$ 898.00	\$ 898.00
Credit card(s)	\$ Ø	\$ Ø
Department store(s)	\$ Ø	\$ Ø
Other: _____	\$ Ø	\$ Ø
Alimony, maintenance, and support paid to others	\$ Ø	\$ Ø
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ 150.00	\$ 150.00
Other (specify): _____	\$ Ø	\$ Ø
Total monthly expenses:	\$ 6,330.37	\$ 6,330.37

9. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

Yes

No

If yes, describe on an attached sheet.

10. Have you paid – or will you be paying – an attorney any money for services in connection with this case, including the completion of this form?

Yes

No

If yes, how much? _____

If yes, state the attorney's name, address, and telephone number:

11. Have you paid – or will you be paying – anyone other than an attorney (such as a paralegal or a typist) any money for services in connection with this case, including the completion of this form?

Yes

No

If yes, how much? _____

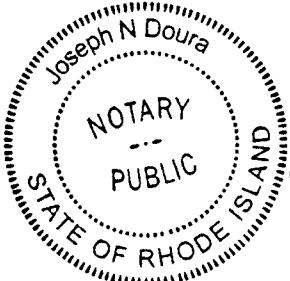
If yes, state the person's name, address, and telephone number:

12. Provide any other information that will help explain why you cannot pay the costs of this case:

We can pay the \$200.00 filing fee but cannot pay the costs of an attorney or for document preparation as this Court requires in the Rules.

I declare under penalty of perjury that to the best of my knowledge, the foregoing is true and correct.

Executed on: August 26, 2019



A large, flowing handwritten signature in black ink, appearing to read "Joseph N. Doura".

(Signature)

A handwritten signature that appears to be "Joseph N. Doura" followed by the date "9/22/22" written below it.

ATTACHMENT

8. Estimate the average monthly expenses of you and your family. Show separately the amounts paid by your spouse.

With regard to Regular Business expenses, My husband intends to retire over the course of the next year and work part time consulting and teaching security and fire alarm systems. The costs associated with the establishment of that business is reflected in my answer in No. 8, which includes licensing, filings and insurances. I also have a volunteer organization RI Hope civics education which is associated with filing costs, all of which my husband pays for.

9. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

We expect our income to decrease. My husband is 67 years old and is planning on retiring. We will only have his SS check and part-time work in his own business.